

Exhibit O

Estate of Kevin Patrick McQuade

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
ANNE McQUADE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA)
 : SS.:
COUNTY OF PASCO)

ANNE McQUADE, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 7326 Baltusrol Drive, Newport Richie, FL 34654.

2. I am currently 58 years old, having been born on June 27, 1963.

3. I am the wife of Kevin Patrick McQuade, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my late husband's estate.

4. My husband passed away from esophageal cancer on August 25, 2011, at the age of 56. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On December 18, 2013, I was issued Letters of Administration on behalf of my husband's estate by the Circuit Court for Pinellas County, Florida, Probate Division.

6. Kevin and I had a very good relationship. We enjoyed playing darts, going out with friends to dinner and parties, and supporting our two sons by going to their baseball and football games. We also loved to do family things together. We especially liked to travel and go on cruises.

7. Within days of 9/11, my husband was working on the Staten Island Ferry and heading into Manhattan to take water and supplies to first responders. For years after 9/11, until about 2009, Kevin continued working on the ferry, breathing in the toxic dust every day. He was provided only a paper-thin mask. He was a deckhand who was responsible for cleaning up the ferry, tying up the boat up to the dock, and checking on passengers.

8. Following 9/11, Kevin developed trouble swallowing. He had difficulty eating because he would complain that food was “stuck” in his chest. He was very uncomfortable and rarely finished a meal, which caused him to start to lose a lot of weight.

9. In 2008, his condition worsened. He went to a doctor who conducted a Barium swallow test and endoscopy, which revealed that Kevin had Stage IV esophageal cancer. After seeking multiple opinions, Kevin went to Sloan Kettering for treatment and was prescribed strong chemotherapy to try to shrink the tumor. It was exhausting for Kevin to sit through 4 hours of chemotherapy. It took everything out of him.

10. In February 2009, Kevin underwent an esophagectomy to remove and reattach his esophagus. After surgery, he developed a severe infection and had to have surgery again. He remained in the hospital for two weeks. Kevin required round-the-clock care for months. He would be woken up repeatedly by alarms on his machine going off in the middle of the night. He was in so much pain and discomfort that he was unable to sit up by himself. Getting up to go on a walk was a chore, and he could no longer walk up the stairs. He ultimately became so weak

that he was forced to retire from his job.

11. Kevin seemed to be doing well for a little while. But in July 2011, shortly after we lost our house and our family was forced to move to Florida, Kevin's cancer came back and had metastasized to his spine and bronchial tube and chest. He developed a fistula in the esophagus/bronchial area. He underwent a few rounds of radiation of the spine to try to treat his excruciating pain, but ultimately the doctors concluded there was nothing they could do. They sent him home to enjoy whatever time he had left.

12. Toward the end, Kevin could no longer move around and had to sleep in a hospital bed downstairs. I set up a pullout bed next to him because he didn't want to be apart from me. Kevin needed assistance going to the bathroom. He had fallen and hit his head on the tub one time when he attempted to go by himself. He ultimately had to go to hospice, which he vehemently did not want to do. He didn't want to leave his family because he knew all too well that he wouldn't be coming home again.

13. Kevin suffered greatly and was uncomfortable most of the time. He tried to hide his pain from his family, but it didn't take a genius to see what he was going through. He was frustrated that he was so weak and needed help with everything. He didn't want to be a burden on anyone. Before being forced to retire, Kevin tried to work through the pain to provide for his family. He would work the midnight shift, get off from work in the morning, go to chemotherapy, sleep for a while, and then go back to work. He didn't want to let cancer beat him. He would suffer through pain and sometimes even vomit at work. Although he tried to put a smile on his face, when things got bad, Kevin was very depressed. He would hide in the bedroom, not wanting to see me or his kids.

14. In the end, Kevin suffered horribly. He never wanted to be separated from his family but needed so much help just to get through the day. He started forgetting things and was always restless. He just couldn't seem to get comfortable. It was devastating to watch such a strong, independent man who took pride in providing for his family and caring for other people, suffer such a painful and heartbreaking fate. He didn't deserve it.

Anne McQuade
ANNE McQUADE

Sworn to before me this
2nd day of May, 2022

Charlene Galla
Notary Public
Charlene Galla



Charlene D. Galla
State of Florida
My Commission Expires 02/18/2024
Commission No. GG 958637

Estate of Trevor Arnold Miller

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
ELAINE MILLER**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF HUDSON)

ELAINE MILLER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 415 Cator Avenue, Jersey City, New Jersey 07305.

2. I am currently 59 years old, having been born on January 30, 1963.

3. I am the wife of Trevor Arnold Miller, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. Trevor passed away from penile cancer on September 4, 2017, at the age of 63. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On December 13, 2017, I was granted Letters of Administration on behalf of my husband's estate by the Union County Surrogate's Court of the State of New Jersey.

6. Trevor was a loving husband and we built a beautiful life together. Trevor was my best friend, and I miss the life we shared. Trevor was a strong man who enjoyed the outdoors, even chores, including maintaining our home and mowing the lawn. As a couple, we traveled frequently together, including trips to the Caribbean, where Trevor could enjoy an active lifestyle, including jet skiing, swimming, and other sports.

7. On September 11, 2001, Trevor and I both worked in Manhattan's financial district. Trevor was at One New York Plaza, and I worked at 390 Greenwich Street, only a few blocks away. On the day of the terrorist attacks, Trevor was told to leave the building and we didn't see each other until much later in the evening. After being informed that it was safe to return, Trevor returned to work within approximately three weeks after the attack.

8. I first discovered that Trevor had a serious medical condition in 2015 after finding blood when I was changing our bed sheets. Trevor went to the doctor and had a biopsy, which led to him being diagnosed with penile cancer. Trevor was utterly devastated by the diagnosis and was very uncomfortable with all of the symptoms. My husband was a proud man; however, his diagnosis left him feeling embarrassed and that his manhood was lost.

9. With Trevor in perpetual pain, I can see that his cancer had a demoralizing impact on his daily life and emotional health. Given the sensitive nature of his penile cancer, I tried to be strong and protect Trevor's privacy as much as possible. However, for Trevor this must have been even worse. I knew Trevor to be a strong man, but after being stricken with cancer, he struggled as he was subjected to indignities, such as needing help from nurses just to clean himself.

10. While Trevor and I both worked before his diagnosis, Trevor was proud to work hard and provide support to his family. Unfortunately, from the time of his biopsy, Trevor was no longer able to work and pursue his professional passions. As a result, I became the sole breadwinner. I not only had to go to work every day, but I had to take care of my husband as well. Despite setbacks, Trevor wanted to survive and was eager to fight the cancer any way he could. This led to him agreeing to undergo a clinical trial in Alabama. Because the flight was too uncomfortable, Trevor moved to his mother's house in Florida where the experimental treatment could be accessible by car. There is no question in my mind that, despite the incredible pain, Trevor made every effort to obtain the most effective care possible.

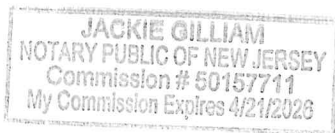
11. My husband's cancer and death were overwhelming for our entire family. The Court should know that in his final days, Trevor said to me that "I can literally feel the cancer eating me

up.” I know he would have wanted me to do everything possible to demand justice.


ELAINE MILLER

Sworn to before me this
5th day of April, 2022


Notary Public



Estate of Paul Steven Morigi

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
LINDA MORIGI**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ROCKLAND)

LINDA MORIGI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 45 Montebello Commons Drive, Suffern, New York, 10901.

2. I am currently 72 years old, having been born on October 27, 1949.

3. I am the wife of PAUL STEVEN MORIGI, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my claim on behalf of my husband's estate.

4. On May 14, 2010, my husband Paul died from pulmonary fibrosis at the age of 60. It was medically determined that Paul's illness was causally connected to his exposure resulting from the September 11, 2001 terrorist attacks.

5. On June 4, 2010, I was issued Letters Testamentary on behalf of my husband's estate by the State of New Jersey, Bergen County Surrogate's Court.

6. Paul was so deeply involved in my life and we did so much together. Perhaps most importantly, we raised a beautiful son together. We enjoyed life tremendously, going on many trips, and staying active together, often playing golf or cross-country skiing. Paul's family had a villa in Italy and we would go there to explore the countryside, see relatives, and enjoy

authentic Italian cuisine. On some other memorable trips, we traveled to Jamaica, Aruba, and the islands of Turks and Caicos. On the trip to Jamaica in 2008, we did some off-roading with a Jeep and saw lots of iguanas running around. We enjoyed a good life.

7. On September 11, 2001, I remember being on the phone when Paul called from the stock exchange right after the plane hit. Paul told me that he ran down the street and people were hiding behind barricades because there was so much dust and debris. He found some people and took a ferry to New Jersey, where I later picked him up in Morristown. Paul was covered in dust, and I kept the suit he wore that day, placing it in a bag and storing it for years. After a couple of moves and Paul's passing, I decided to throw it out. Paul worked as a stock trader and continued to work on the American Stock Exchange for years after 9/11. Paul went to work in the heart of the financial district every day until 2009, and he described to me how awful the area around the World Trade Center was after the attacks. I know he was quite devastated, having to return to the area on a daily basis and being reminded of the terrorist attacks. Beginning his commute from our old home in Ramsey, New Jersey, Paul took the PATH into the City every day. After they cleaned up the World Trade Center site, the PATH terminated in the basement of the World Trade Center, so he would have to walk past the construction and the demolition work on a daily basis.

8. Shortly after 9/11, my husband had breathing issues and a bad, hacking cough. It was due to all the toxic dust in the air. There were still tons of particulates floating around, which took time to settle. I remember Paul said that he hated going through that area and walking to work because you could smell how terrible the air was, making his presence there a serious health risk. Before his illness, Paul and I enjoyed an active life together. For Paul, I feel sad that he was no longer able to do the things he enjoyed the most. After his breathing difficulties developed, even gardening became quite difficult, and he had to garden in much more limited ways.

9. As far as his pulmonary fibrosis, Paul suffered tremendously. Due to his breathing difficulties, he started seeing a pulmonologist on July 28, 2004 and continued treatment with that doctor until February 11, 2009. Paul had completed several chest high-resolution tests and was going back and forth to a myriad of doctors. It was agonizing for him to cough constantly, interrupting every aspect of his life, from simple conversations, to work, to even a quiet rest.

10. As his condition worsened, Paul couldn't do the things that he wanted to do anymore. It just destroyed him, slowly but surely. It took away his being, his soul, his beautifulness. He'd wake up hacking in the middle of the night and could not sleep well. After being on the train to work, tired, he would have to go through seeing everything that reminded him of 9/11. Paul had survivor's guilt and would frequently describe the story of escaping the WTC area on 9/11. He felt that pain and frustration as the respiratory problems worsened. I could hear him coughing when he was in the shower. He would try to hide the severity of his coughing; however, as time went on, the degree of his illness became more apparent.

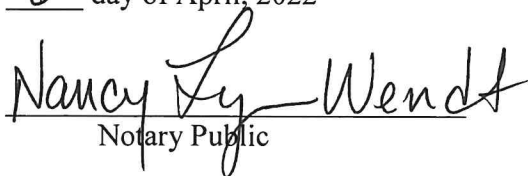
11. After 9/11, Paul just wasn't the same man. He just wasn't happy; it destroyed him. His story of the escape from New York City became well known amongst friends because he told it often. It really took a toll on him because so many others nearby that we knew lost family members on 9/11. I believe it was difficult for my husband to reconcile the fact that he had survived the attack, injured by the toxic dust, while so many others so close by had perished.

12. Paul was always a witty person with a little bit of a dark sense of humor. His illness changed him in this regard. He seemed to lose his sense of humor. He still showed some signs of his former self, but was very depressed. Even though he wasn't the type to talk about it, I could see that he was a depressed man. The frequent 9/11 tributes brought back many emotions for him.

13. Paul passed away in his sleep. I was in total shock. Talking about his death is very emotional for me. It pains me to think about everything my husband went through, including all those trips into the City, which made it so excruciating just to get to work. I haven't had him for a long time now and I miss him terribly. The impact of Paul's death had terrible rippling effects on my son and me, as well as Paul's parents and friends.


LINDA MORIGI

Sworn to before me this
6 day of April, 2022


Notary Public

NANCY LYNN WENDT
NOTARY PUBLIC-STATE OF NEW YORK
No. 01WE6220427
Qualified in Orange County
My Commission Expires 04-12-2022

Estate of John Patrick Morrissey

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOANNE T. ALCABES, et al,

**AFFIDAVIT OF MARY
MARCELLINE MORRISSEY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK)
 : SS.:

COUNTY OF WESTCHESTER)

MARY MARCELLINE MORRISSEY, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 2 Peck Avenue, Apt. 21A, Rye, New York 10580.
2. I am currently 68 years old, having been born on July 6, 1953.
3. I am the wife of John Patrick Morrissey, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. John passed away from pulmonary fibrosis and colon cancer on February 25, 2014. It was medically determined that his illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On January 26, 2015, I, jointly with my daughter, Catherine M. Trotta, were issued Letters Testamentary by the Dutchess County, New York Surrogate's Court.

6. My husband and I had a wonderful relationship. We always had fun together. Ours was an untraditional love story. We dated, were apart for nearly twenty years, during which time I went into the Air Force, got married, and had children. Then after my divorce, we reconnected, picked up right where we left off, and got married in 2003. We merged our families, and John embraced my children as his own. We loved to travel and go on cruises. John was the life of the party and loved to plan social activities for us to do.

7. On 9/11, John was a retired firefighter with the FDNY. He quickly jumped in to help first responders wherever he could. He went down to near the World Trade Center site to hand out waters. He was on the ground helping for nearly two weeks. He wanted to help his brothers and volunteered through his various brotherhoods.

8. Following 9/11, my husband started slowing down significantly. I knew something was wrong. We used to like to take long walks along the Hudson River. John was always able to walk quickly, but suddenly he could barely keep up with me. At first, I thought he was joking, but then I noticed he wasn't breathing right. I encouraged him to see a doctor. He consulted with a series of specialists who recommended he use portable oxygen. It only got worse from there. John began to have trouble walking even short distances. He needed more and more oxygen. He couldn't go anywhere without his oxygen. Soon thereafter, his doctor discovered something suspicious on his colon that required surgery. The surgery, which I thought was routine, lasted over five hours. I was in a panic. The doctor came out and told me that John had colon cancer, but he believed he removed it during the surgery. I was in complete shock. I wasn't expecting that at all. By 2010, we had to move to single floor living with elevator access because John couldn't make it up the stairs anymore. He also could no longer do things like go out to eat, dance, or meet up with family and friends. In 2011, we took our last trip

together on a European cruise. He got sick on the ship. He couldn't breathe. He couldn't eat. He had to go to the infirmary to get more oxygen. We had to leave the cruise early and get a medical escort home. It was a sad wake up call to the life that we weren't going to be able to live any longer. John never bounced back. In 2014, he collapsed on a marble floor, passed out, turned blue, and broke his nose. I called 911 and an ambulance came and took him to Vassar to run tests. They told him that they didn't know how much time he had left. I was floored. This couldn't be happening to us. We were supposed to have a lifetime together to make up for the time we missed. We tried to enjoy whatever time we did have left, and mostly stayed home watching movies and being together as much as possible. A week after his fall, John passed away. I was completely destroyed.


9. Before 9/11, my husband was active and in good shape as a firefighter. Due to his illnesses, he significantly declined physically and mentally. He had trouble breathing and difficulty sleeping. He easily ran out of oxygen. He had issues with circulation in his feet and constant swollen legs. John wasn't the type of person to ever complain or say that he was in pain, but I could tell he was hiding things. He didn't want to talk about what was happening to him, and he didn't want to acknowledge that he was getting worse. Although he struggled to find words for what he was going through, it was clear how much it changed all of our lives. He used to be easy going and happy, always thinking about how he could help others, but he became very irritable and out of control when he got sick and would have extreme reactions to minor setbacks. One time, I forgot to get him duck sauce at the grocery store, and he was so mad for no reason.

10. John was a firefighter and committed to helping others. He always tried to look at the bright side of things and was hopeful he would be saved by some new treatment or

experimental therapy. He tried to protect himself from his bad prognosis and largely lived in denial about how bad his health had actually become. I saw the truth and was devastated to see him decline like he did and struggle to breathe in the end. My husband had a horrible life after he got sick. He always used to tell me that, as a fireman, one of the most important things to know was when you needed to get fresh air. When he got sick, he could no longer get fresh air. When he had a particularly bad episode, he would have trouble breathing, depend on oxygen, and turn blue and pass out. It was frightening to see. He could no longer live a fun and exciting life or travel freely. He was tied to his oxygen tank. He was hopeful they would find a miracle cure and then he was gone. He didn't deserve that. His family didn't deserve that.

Mary M. Morrissey
MARY MARCELLINE MORRISSEY

Sworn to before me this
16TH day of May, 2022


Notary Public

DREW ALEXANDER
Notary Public of New York
I.D. 01AL641646
COMMISSION EXPIRES 03/01/2025